

CNR
F. #2018R00843

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

☆ MAR 18 2019 ☆

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

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UNITED STATES OF AMERICA

STIPULATION AND ORDER

- against -

Cr. No. 18-614 (JS)

CHRISTIAN ROMANDETTI,

Defendant.

----- X

WHEREAS, the discovery materials to be provided by the government in the above-captioned case (hereinafter, the "Discovery Materials") contain personal financial information and personally identifiable information regarding individuals other than the defendant (collectively, hereinafter "PII"), including information relating to the bank account numbers, addresses, social security numbers and dates of birth of those other individuals,

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned that:

1. The Discovery Materials can be used by the defendants and their defense counsel in this matter only for purposes of trial preparation, defense at trial against the charges set forth in the above-captioned indictment, and any related appellate matters arising from the above-referenced trial.
2. Absent further order of the Court, the defendants and their defense counsel may not disclose or disseminate the Discovery Materials containing PII (even if the PII has been redacted) or any information contained in those documents to anyone who has

not signed this Stipulation and Order, other than those of defense counsel's legal staff and any potential expert witnesses, vendors and/or investigators that have been advised of and agreed to be bound by the terms of this Stipulation and Order. If the defendants, their defense counsel, or anyone else who has received Discovery Materials containing PII from the defendants or their counsel pursuant to the terms of this Stipulation and Order seeks to make further disclosure or dissemination of the Discovery Materials with PII (even if the PII has been redacted), notice must first be provided to the government and the Court, and such notice must be given sufficiently in advance of the contemplated disclosure or dissemination so as to permit briefing and argument on the propriety thereof.

3. In the event that the defendant seeks to file Discovery Materials with the Court or otherwise use Discovery Material during a court proceeding, the defendants and their counsel will comply with Rule 49.1(a) of the Federal Rules of Criminal Procedure, will ensure that court transcripts are appropriately redacted to protect PII and financial information, and will seek permission from the Court to offer the redacted versions of Discovery Material into evidence unless it is necessary to offer the unredacted version.

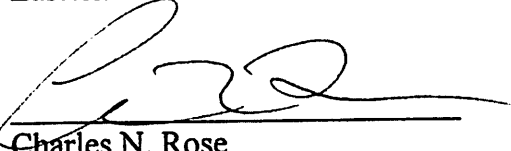
4. The defendants and their defense counsel will return to the government all copies of the Discovery Materials provided by the government through discovery in this case at the conclusion of this matter, specifically either within seven days of (a) a verdict of acquittal rendered by a jury, (b) the date of sentencing if no appeal is filed, (c) the issuance of an appellate decision rendering a final judgment, or (d) the conclusion of any collateral appeal or attack on any decision.

5. Any violation of this Stipulation and Order (a) will require the immediate return to the government of the Discovery Materials, and (b) may result in contempt of Court.

Dated: Central Islip, New York
February 21, 2019

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By:


Charles N. Rose
Assistant U.S. Attorney

Agreed to by:

Christian Romandetti, Sr.
Defendant

Frank Sarro
Defendant

Fritz Scheller, Esq.
Attorney for Romandetti

Maureen Hoerger, Esq.
Attorney for Sarro

Jeffrey Miller
Defendant

Mark Burnett
Defendant

John Arlia, Esq.
Attorney for Miller

William Wexler, Esq.
Attorney for Burnett

SO ORDERED:

THE HONORABLE JOANNA SEYBERT
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK

5. Any violation of this Stipulation and Order will be raised with and determined by the Court, and may result in sanctions to be imposed by the Court.

Dated: Central Islip, New York
March 15, 2019

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By:

Charles N. Rose
Assistant U.S. Attorney

Agreed to by:



Christian Romandetti, Sr.
Defendant



Fritz Scheller, Esq.
Attorney for Romandetti

Frank Sarro
Defendant

Maureen Hoerger, Esq.
Attorney for Sarro

Jeffrey Miller
Defendant

Mark Burnett
Defendant

John Arlia, Esq.
Attorney for Miller

William Wexler, Esq.
Attorney for Burnett

SO ORDERED:

THE HONORABLE JOANNA SEYBERT
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK

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Dated: Central Islip, New York

2/22, 2019

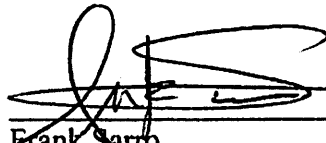
RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By:

Charles N. Rose
Assistant U.S. Attorney

Agreed to by:

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Attorney for Sarro

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Defendant

Mark Burnett
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SO ORDERED:

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UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK

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Dated: Central Islip, New York
_____, 2019

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: _____

Charles N. Rose
Assistant U.S. Attorney

Agreed to by:

Christian Romandetti, Sr.
Defendant

Fritz Scheller, Esq.
Attorney for Romandetti

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John Arlia, Esq.
Attorney for Miller

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SO ORDERED:

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EASTERN DISTRICT OF NEW YORK

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Dated: Central Islip, New York
_____, 2019

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: _____
Charles N. Rose
Assistant U.S. Attorney

Agreed to by:

Christian Romandetti, Sr.
Defendant

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SO ORDERED:

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UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK

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Dated: Central Islip, New York
_____, 2019

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: _____
Charles N. Rose
Assistant U.S. Attorney

Agreed to by:

Christian Romandetti, Sr.
Defendant

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Maureen Hoerger, Esq.
Attorney for Sarro

Jeffrey Miller
Defendant

Mark Burnett
Defendant

John Arlia, Esq.
Attorney for Miller

William Wexler, Esq.
Attorney for Burnett

SO ORDERED:

/s/ Joanna Seybert

THE HONORABLE JOANNA SEYBERT
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK

Dated: Cent. Islip NY
Mar. 18, 2019